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Attorneys for Defendant

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION

DR. RUPA BALA,

Plaintiff,

v.

OREGON HEALTH AND SCIENCE  
UNIVERSITY, an Oregon public  
corporation; DR. CHARLES HENRIKSON,  
an individual; DR. JOAQUIN CIGARROA,  
an individual,

Defendants.

Case No.: 3:18-CV-00850-HZ

**DEFENDANTS' EXHIBIT LIST**

Defendants Oregon Health and Science University (“OHSU”), Dr. Charles Henrikson, and Dr. Joaquin Cigarroa (collectively “Defendants”) submit the following list of trial exhibits<sup>1</sup>:

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<sup>1</sup> Many of the exhibits below contain documents subject to the parties’ stipulated protective order in this case.

<b>Exhibit #</b>	<b>Date</b>	<b>Description</b>	<b>Preadmitted</b>	<b>Offered</b>	<b>Received</b>
501		Photos of Cath lab			
502	1/2/2017	Audio recording of OHSU transfer center call between plaintiff and Kevin Ochoa			
503	1/7/2017	Audio recording of OHSU transfer center call between plaintiff and Anthony Ferroggiaro			
504		OHSU Code of Conduct			
505	4/9/2013	OHSU Policy: Faculty Appointments			
506		Plaintiff's curriculum vitae when hired at OHSU			
507		Plaintiff's updated curriculum vitae			
508	7/16/2014	OHSU offer letter to plaintiff			
509	1/5/2015	OHSU Clinician Employment Agreement with plaintiff			
510	2/13/2015	Email from Charles Henrikson to Greg Lampros re plaintiff's ideas for clinic			
511	2/17 - 2/18/2015	Emails between plaintiff, Eric Stecker and Charles Henrikson re scheduling difficulties			
512	3/9 - 3/11/2015	Emails between plaintiff and Charles Henrikson re inventory change recommendations			
513	3/17 - 3/18/2015	Emails between plaintiff and Christopher Turner re lab staff teaching			
514	3/17 - 3/18/2015	Emails between plaintiff and Charles Henrikson re sheath protocols			
515	3/31 - 4/1/2015	Emails between plaintiff and Charles Henrikson re lab sheath protocol			
516	4/16/2015	Email from Charles Henrikson to plaintiff, Eric Stecker, and Thomas Dewland re EP retreat			
517	5/2 - 5/4/2015	Emails between plaintiff and Charles Henrikson re EP staffing issues			
518	5/3 - 5/4/2015	Emails and attachments from Jennifer Lapin to plaintiff re summary report of teaching evaluations from University of Pennsylvania			
519	5/22/2015	OHSU letter to plaintiff re extension of academic appointment			
520	7/11/2015	Email and attachment from Charles			

<b>Exhibit #</b>	<b>Date</b>	<b>Description</b>	<b>Preadmitted</b>	<b>Offered</b>	<b>Received</b>
		Henrikson to nursing leadership re new lab protocol			
521	8/12/2015	Email between Kathy Heitman-Allen and Judi Workman re complaints about plaintiff's treatment of Medtronic Sales Rep			
522	8/19/2015	Email from Stephen Robinson to Charles Henrikson re feedback about plaintiff			
523	8/21/2015	Emails between plaintiff and Tom Clark re working at OHSU			
524	8/31/2015	Notes from Charles Henrikson re meeting with plaintiff			
525	9/8/2015	Emails between Stephen Robinson, Jeffrey Kirsch, and Izumi Harukuni re request to not be assigned to plaintiff's cases			
526	9/13/2015	Emails between plaintiff and Charles Henrikson re device setup and prep			
527	9/17/2015	Notes from Joaquin Cigarroa re meeting with plaintiff about professionalism with fellows			
528	9/17/2015	Email from Lidija McGrath to Joaquin Cigarroa, Albert Camacho, and Charles Henrikson re incidents involving plaintiff on consult service			
529	9/17/2015	Email between Tuan Mai and Joaquin Cigarroa re interaction with plaintiff			
530	9/17/2015	Emails between plaintiff and Rachel White re meeting about sheath protocol			
531	10/1 - 10/6/2015	Emails between Sanjiv Kaul, Linda Strahm, and Charles Henrikson re performance expectations and plaintiff's contract			
532	10/7/2015	Notes from meeting between Charles Henrikson, Judi Workman, Kathy Heitman-Allen, Tara Menon, and plaintiff re plaintiff's performance			
533	10/9/2015	OHSU Performance Expectations Plan re plaintiff			
534	11/1/2015	Email and attachment from plaintiff			

<b>Exhibit #</b>	<b>Date</b>	<b>Description</b>	<b>Preadmitted</b>	<b>Offered</b>	<b>Received</b>
		re response to Performance Expectations Plan			
535	11/8/2015	Email from Denise Delephant to Jennifer Packer re plaintiff's interactions with emergency transport staff			
536	11/12/2015	Email from Jeffrey Kirsch to plaintiff re complaints about plaintiff from anesthesiology staff			
537	11/12/2015	Email from Sanjiv Kaul to Charles Henrikson re complaints about plaintiff from anesthesiology staff			
538	11/12/2015	Emails between Sanjiv Kaul, Charles Henrikson, and Joaquin Cigarroa re Jeffrey Kirsch's email to plaintiff			
539	11/12/2015	Emails between Jeffrey Kirsch, Charles Kilo, and Joaquin Cigarroa re Jeffrey Kirsch's email to plaintiff			
540	11/12/2015	Emails between plaintiff and Charles Henrikson re Jeffrey Kirsch's email to plaintiff			
541	11/13/2015	Email from Andrew Young to Jeffrey Kirsch re concerns about plaintiff's intraoperative behavior			
542	11/13 - 11/16/2015	Emails between Jeffrey Kirsch and Michael Tom re complaints about plaintiff from anesthesiology staff			
543	11/17/2015	Email from Susan Bardon to Charles Henrikson re interaction with plaintiff			
544	11/19 - 11/20/2015	Emails between Joaquin Cigarroa and plaintiff re meeting with Linda Strahm about investigation into complaints			
545	11/12 - 11/30/2015	Emails between Michael Tom and plaintiff re meeting with Linda Strahm to discuss complaints			
546	11/12 - 12/1/2015	Emails between Linda Strahm, Michael Tom, and plaintiff re meeting between Linda Strahm and plaintiff to discuss complaints			
547	11/30 - 12/4/2015	Emails and attachment from plaintiff to OHSU re University of Pennsylvania teaching evaluations			

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548	11/25 - 12/5/2015	Emails between Chuck Henrikson, Linda Strahm, and Anesthesiology leadership re plaintiff's procedures with anesthesia team			
549	12/9/2015	Email from Peter Schulman to Emily Baird and Elizabeth Olivera re procedure with plaintiff			
550	12/17/2015	OHSU student evaluations of plaintiff			
551	1/8/2016	Notes re Charles Henrikson's requests of plaintiff			
552		Notes re plaintiff's requests of Charles Henrikson			
553	1/25 - 1/28/2016	Emails between Linda Strahm, Charles Henrikson, and Karen Paladino re interaction with plaintiff			
554	2/23/2016	Email from Rachel White to Kathy Heitman-Allen with 7/15/15 KCVI Arrhythmia CQI Charter Final			
555	3/15/2016	Emails between Joaquin Cigarroa, Charles Henrikson, and Sanjiv Kaul re changing Performance Expectations Plan to coaching letter			
556	3/15 - 3/20/2016	Emails between Linda Strahm, Charles Henrikson, and Joaquin Cigarroa re communication to plaintiff about coaching			
557	3/21/2016	Coaching letter re plaintiff			
558	4/15/2016	Email from Kathy Heitman-Allen to Charles Henrikson and Judi Workman re several complaints about plaintiff			
559	5/1/2016	Notes from Charles Henrikson re events involving plaintiff in January and April			
560	5/4/2016	Email from plaintiff to Linda Strahm re update on incident involving Julie Kelly			
561	5/8/2016	Email from Charles Henrikson to Sanjiv Kaul re plaintiff's performance and contract			
562	5/12/2016	Emails between plaintiff and Charles Henrikson re instructions for			

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		procedures			
563	7/1/2016	Letter to plaintiff re salary and incentives			
564	7/6 - 7/11/2016	Emails between plaintiff and Linda Strahm re meetings and coach			
565	8/12/2016	Email from Kathy Heitman-Allen to Charles Henrikson re complaints about plaintiff during procedure			
566	8/24/2016	Emails between Charles Henrikson and Linda Strahm re complaints about plaintiff during procedure			
567	9/15/2016	Email from Christopher Turner to Kathy Heitman-Allen re report re procedure with plaintiff			
568	10/25/2016	Handwritten notes from Alan Lee Brown re procedure with plaintiff			
569	10/25/2016	Email from Linda Strahm to plaintiff re completed investigation and plan to escalate plaintiff's concern re patient incident			
570	11/6/2016	Email from plaintiff to Dartmouth-Hitchcock Medical Center re plaintiff's application for employment			
571	11/10/2016	Emails between Alan Lee Brown, Kathy Heitman-Allen, and Charles Henrikson re plaintiff's behavior during procedures			
572	11/10 - 11/11/2016	Emails between plaintiff, Charles Henrikson, and Clayton Allen re staffing issues			
573	11/16 – 11/17/2016	Emails between plaintiff and Charles Henrikson re clinic concerns			
574	12/2/2016	Memo re Cath Lab Event Review			
575	12/9 - 12/10/2016	Emails between plaintiff, Charles Henrikson, and Kathy Heitman-Allen re incidents in lab			
576	12/10/2016	Email from Joaquin Cigarroa to Eric Stecker re review of potential patient safety incident			
577	12/6 - 12/11/2016	Emails between plaintiff and Kathy Heitman-Allen re lab safety and staffing issues, forwarded to Sharon			

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		Anderson			
578	12/20/2016	Email from Sanjiv Kaul to plaintiff forwarding email re open position			
579	1/3 - 1/5/2017	Emails between Linda Strahm and Charles Kilo re cardiology consult call between plaintiff and Kevin Ochoa			
580	1/5 - 1/8/2017	Emails between plaintiff, Charles Henrikson, and Babak Nazer re draft notification criteria			
581	2/13/2017	Email from Charles Kilo to plaintiff re plaintiff's communication			
582	2/13 - 2/14/2017	Emails between plaintiff and Linda Strahm re meeting with Charles Kilo and filing PSI report			
583	3/3/2017	Email from plaintiff to Linda Strahm re unemployment			
584	3/8 - 3/13/2017	Emails from plaintiff to Linda Strahm re PAS process and contacting AAEO			
585	3/24 - 3/26/2017	Emails between Eric Stecker and Kathy Heitman-Allen re EP team member onboarding/training			
586	8/8 - 8/16/2017	Emails between plaintiff and University of North Carolina colleague re open faculty position			
587	9/4/2017	Email from plaintiff to University of Rochester college re EP faculty position			
588	11/20/2017	Emails between plaintiff to Doctor's Choice Placement Services re job opportunities			
589	11/20/2017	Email between plaintiff and SourceMD re job opportunities			
590	11/25/2017	Email from plaintiff to Pete Weiss re potential open job position			
591	11/28/2017	Email between plaintiff and PracticeLink re job opportunities			
592	11/30/2017	Email between plaintiff and Riverside Health System re job opportunities			
593	3/28/2018	Physician Employment Agreement between Banner and plaintiff			

<b>Exhibit #</b>	<b>Date</b>	<b>Description</b>	<b>Preadmitted</b>	<b>Offered</b>	<b>Received</b>
594	6/11/2019	Email and attachment from Nancy Sweitzer to plaintiff re Documented Verbal Discussion and Request a Coach forms			
595	6/11/2019	Banner Documented Verbal Discussion			
596	1/17/2020	Letter from Banner re Notice of Termination of Physician Employment Agreement			
597	2/19 - 2/29/2020	Emails between plaintiff and Everett Clinic re plaintiff's application and references			
598	10/20/2020	Email from plaintiff to Francis Marchlinski re Dr. Hakan Oral reference			
599	2/8/2021	Employment Agreement between United Medical Associates PC and plaintiff			
600	8/6/2021	Employment Agreement between United Medical Associates PC and plaintiff			
601	2/11/2022	Email from plaintiff to Afzal Rehman re resignation from UHS			
602	4/27 - 5/2/2022	Emails between plaintiff and University of Wisconsin recruiter re application for position, discussing lawsuit			
603	5/11 - 5/12/2022	Emails between plaintiff and University of Buffalo recruiter re EP position			
604	10/14/2022	Citrus Cardiology offer letter to plaintiff			
605	10/26/2022	Physician Services Employment Agreement between Citrus Cardiology and plaintiff			
606	10/24 - 10/26/2023	Emails between Nora Ostrofe and plaintiff re Citrus Cardiology compensation and benefits			
607	12/13/2023	Letter from Citrus Cardiology to plaintiff re automatic renewal of employment agreement and productivity compensation			
608	12/13 -	Emails between plaintiff and Jerry			

Exhibit #	Date	Description	Preadmitted	Offered	Received
	12/17/2023	Deloach re 2024 contract and productivity model			
609	2015-2017	OHSU compensation report re plaintiff			
610	2017-2019	OHSU Retirement Account Summary re plaintiff			
611	2018-2020	Banner Payroll Report re plaintiff			
612		Practice Link dashboard for plaintiff			
613		Summary of Plaintiff's Maximum Lost Earnings			
614		Physician Compensation Benchmark Comparison			
615		Projected Total Compensation and Benefits (2017 to 2043)			

DATED: March 11, 2024.

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